

ST. LOUIS COUNTY AMERICAN JOB CENTER  
INDIVIDUAL TRAINING ACCOUNTS  
TRAINING GUIDELINES AND OPERATIONAL PROCEDURES

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**Background:**

This ITA policy is designed to serve as common guidelines for all ITA requests. It is not all-inclusive, as each request may have differences which require consideration. However, all approvals and denials will be apart of the contracted sub-recipients, for Saint Louis County Workforce Development, responsibilities to determine funding limitations and it is their obligation to make sound fiscal decisions.

St. Louis County residents have Priority of Service for the disbursement of WIOA training funds. Residents outside of the St. Louis County Region will be approved on a case-by-case basis. The case-by-case determination will depend on level of training funds remaining for the fiscal year.

**Training services may be available to individuals who:**

1. The contracted sub-recipient, after an interview, evaluation, assessment and career planning are:
2. Unlikely or unable to obtain or retain employment that leads to economic self- sufficiency or wages comparable to or higher than wages from previous employment through career services; **and**
3. In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment; **and**
4. Have the skills and qualifications to participate successfully in training services; **and**
5. Have selected a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individuals are willing to commute or relocate; **and**
6. Are unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds, TAA and Federal Pell Grants, or require WIOA assistance in addition to other sources of grant assistances including Federal Pell Grants; **and**

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7. If training services are provided through the adult funding stream, are determined eligible in accordance with the State and local priority system, if any, in effect for adults under WIOA

**Examples of Interview, Evaluation, Assessment and Career Planning**

- Interview:  
Customer meets with Skills Team member to evaluate training and career goals
- Assessments:  
Workkeys  
Talify
- Career Planning:  
Review Labor Market Information  
Determine viable and attainable Short and Long Term Goals  
Develop a Career Pathway based on high growth and high demand Sector Strategies

**The following qualifications are also placed on the use of ITA's:**

Except as provided for below, provision of ITAs shall be limited to individuals who:

- Are planning to attend training at a training/educational institution and the program is approved by the Eligible Training Provider System (ETPS) **and** is in the Standard Metropolitan Statistical Area\*\* (SMSA) or the State of Missouri.
- Funding may be limited to assist with courses leading to certifications, licensure or credentialing in existing career or occupational areas.
- Are successfully completing educational programs at a college or university and require assistance to complete an Associate degree.
- Are successfully completing educational programs at a college or university and require assistance to complete the final 65 credit hours toward a Bachelor's degree.

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- Training services may be provided to an individual who otherwise meets these requirements while an application for a Federal Pell Grant is pending.

**Additional ITA Guidelines:**

1. WIOA ITA funding is meant to be used after other sources of funding have been utilized. Therefore, all customers who are considered for training must contact the financial aid office of the training institution to explore funding options prior to requesting WIOA funding and this must be documented by the case manager.
2. Funding for training provider cohorts are only allowed with prior approval from the St. Louis County Workforce Development Division Director and Division Compliance Director. A cohort is 4 or more individuals attending a training class to begin on the same date with the same training provider.
3. The amount of ITAs shall not exceed \$10,000 PER CUSTOMER. Once the Regional limit for ITA funding has been provided, customers are not eligible for additional funding for a **two-year period**. The two-year period commences with the date the regional limit is met; and will include ITA funding received from other workforce regions or US-DOL funding where applicable. The \$10,000 limit may be increased with prior approval from the Division Director in writing.
4. Once training is complete, customers must be offered the option of Follow Up services for 12 months.

Any training plan will be subject to funding de-obligation if a customer fails a portion of training or receives a failing grade. The customer will bear the cost of repeating the course or portion of training and must retake and pass the required course work at the next available opportunity before any additional ITA funds will be provided.

All class withdrawals that result in less than 100% reimbursement to Saint Louis County will be regarded as failing or unsatisfactory. As a result, future semesters will not be funded. The customer will bear the cost of repeating the course or portion of training and must retake and pass the required course work before additional funding will be considered.

The customer must maintain satisfactory progress toward their training goal. Satisfactory progress and/or successfully completing is defined as: 2.0 grade level in college or university

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degree programs and other training programs that provide grade level evaluations. For self-paced, modular, clock-hour training programs, satisfactory progress or successfully completing will be based on milestones addressed in terms of measurable skills attainment and proficiency described in the training curriculum and Individual Employment Plan.

*Distance and Online training programs: May be approved on a case by case basis when the degree or certificate attained at the conclusion of the training program is equivalent to what the customer would have received if they had attended training in a traditional classroom setting.*

**ITA Steps:**

**Before Training Activities:**

1. Customers should participate in facilitated job search activities with American Job Center staff. These activities will be in addition to the customers' individual job search efforts. Such activities will include consultation with staff, job development services, recruitment events, job readiness training and other job search activities. These services and activities must be documented in the State MIS. Staff should fully explore and describe what the customer has done to find work.
2. Customers **must** take the Workkeys assessment or other assessment as determined necessary with Director approval. The results of which will be used to determine if the customer's skill levels demonstrate the likelihood of success in the career area and/or training. The attainment of at least a Bronze Workkeys level is required for ITA funding. If a skill gap(s) is/are indicated, customers must participate in remediation services offered through the American Job Center. After remediation, customers may retake the Workkeys with the goal of achieving at least a Bronze level. The region will accept scores achieved within the last 5 calendar years. *For Special Projects per DOLIR and DHEWD, the Workkeys requirements may be adjusted to coincide with the Special Project program model and parameters. Special Project program model and parameter adjustments must be first approved by the Division Director.*
3. Local MERIC labor market information reflects that the occupation is a high growth or a high demand (MERIC grade B or higher) occupation or industry; **or an O\*NET Bright Outlook occupation.**

**NOTE: The above activities and services must be reflected in the customer's case notes and IEP/ISS in the State MIS.**

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**American Job Center Staff Responsibilities:**

A. Explore/Discuss Training Decision:

- Why this training, area- work history, education, skills, interest/aptitudes must be assessed and documented in the State MIS.
- What schools have they considered; reasonableness of cost, effectiveness of training agency, and other options must be documented in the State MIS.
- How will this training improve their ability to compete for jobs and does it start them on a career path.
- Are there any current job openings that require this skill/credential/knowledge; this information must be documented in the State MIS.
- In determining the appropriateness of training, case managers should consider assessments and individual circumstances.

B. Career Assessment:

- Review/document assessment results achieved for career area

C. Site Selection & Funding:

- ITAs can only be used for approved institutions that have a current contract with both Office of Workforce Development (ETPS) and Saint Louis County
- Request school's assessment results
- Make application for financial aid (Pell Grant) - can be made online and document this step in the State MIS
- Must verify that customer has made application prior to authorizing ITA and it must be documented in the State MIS

D. Review Training Curriculum and Cost:

- Curriculum outline should include all courses/activities needed to complete training and identify credential to be obtained
- Verify begin and end dates of each class/training
- Verify total cost (tuition, supplies, books and fees)
- Obtain transcripts of past classes if applicable, analyze transcripts to determine status and progress towards completion

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E. Complete training plan and Customer Agreement Form:

- Plan must detail which classes will be taken on a semester-by-semester basis or areas/skills included in the training program
- What credential will be obtained (degree, license, diploma etc.) and is it portable
- Duration of training period (# of weeks, months and orsemesters)
- Training cost and WIOA/ITA amount to be authorized
- State the career or position that will be sought upon training completion; sign jointly
- Discuss customer agreement; sign jointly
- Secure a sign release of information and require the school to maintain a signed release to provide American Job Career Center staff with needed information (progress, completion, grades, placement, financial aid)

**State MIS and Record Maintenance Requirements:**

- Employment Plan page/ Training Program information completed
- Employment Plan page/ Progress Evaluation – follow up no later than 60 days
- IEP updated as needed/required
- Case note needed for the delivery of additional services
- Case note all contacts with customer and school
- Class grades/attendance verified prior to disbursement of subsequent allocations of Tuition/ITA funds
- Maintain ITA Financial Tracking log
- Skills Gain Progress Report
- Case note information pertaining to customer's employability
- Document training completion, close 300/314 service, and enter the type of credential obtained on the Closure Tab
- Refer customer to Job placement team services before graduation
- Document employment and whether it is training related under Closure Tab

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**V. Other Training Related Items:**

Attendance Policy: Participants authorized for ITA funding are expected to attend all regularly scheduled classes/training hours.

Participants are expected to regularly contact Job Center staff (career advisor/case manager) to advise of progress and to report any issues or interruption in training. WIOA participants may be put on probation after missing more than 10% of the total training hours/classes. Participants will be given written notice of their probationary status and be asked to sign a status acknowledgement, if any absences occur after the probation, the customer may be terminated and ITA funding ended. Participants experiencing personal issues must notify career center staff and their school immediately to discuss the possibility of a leave of absence (LOA) from training.

If LOA is granted, the customer will be responsible for any additional cost associated with training or repeated course work-for any reason. The customer must provide American Job Center staff with verification from the school regarding the approval of the LOA, begin date, end date and new training completion date.

Monitoring Progress: Skills team staff will regularly monitor the participant's progress to ensure training is being provided and progressing as planned. Skills team staff must engage the customer during training and not rely solely on contact with the school. Contact should occur at minimum, at least every 60 days. ITA participants are also asked to contact their case manager if they encounter problems of any kind.

**Criteria for School Approval:** Training sites must be approved by OWD - Eligible Training Provider System (ETPS) to be considered a viable occupational and training services provider for WIOA ITA funding. The approved training sites can be found at <https://jobs.mo.gov/jobseeker/missouri-eligible-training-provider-system>.

In determining contracts with training providers, St. Louis County Local Workforce Development Board's Workforce Development Administrator and Training Provider Liaison will consider the following elements:

1. Training related job placement of past graduates as verified by American Job Center Staff
2. Employment retention rates of past graduates as verified by American Job Center Staff
3. The program completion rate - based on class size at the beginning of training
4. The pass/fail rate if applicable for certification or licensure

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5. The school's cooperation with American Job Center staff- share information regarding the receipt of PELL grants, loans and other financial assistance; attendance, progress and grades.
6. The anticipated average wage at placement.

These elements will be reviewed and documented (through a report submitted by training providers and verified by appropriate staff) as part of establishing a new contract or renewing an existing contract. The Training Provider Liaison will be the custodian of these records.

Reverse Referrals: All applicants must go through the American Job Center assessments, activities and services as detailed above.

Schools may refer individuals for American Job Center assistance with the understanding that enrollment at their site, or any other school is not guaranteed. All individuals assessed to be in need of training will be referred to all schools in the area to ensure they make an informed decision.

Job Search and Other Job Center Services: Participants are encouraged to participate in American Job Center services to secure employment upon completion of training. Staff should encourage customers to come into the Center **during** training. There are many other workshops, networking events and employer lead activities that customers can attend while in training. ITA customers are to contact Job Center staff to organize their job search and schedule sessions for the following services when training is completed:

1. Recruitment events
2. And other Skills/Job Getting Team services

Staff must encourage customers to keep in touch with the American Job Center, update their contact information, maintain a "Job search only" e-mail address and contact phone number also explore the customer's online profiles and presence for job search purposes.

**NOTE: Please be advised that this document outlines criteria for classroom/occupations skill training and is not all-inclusive and may be revised or updated at any time without prior notice.**



Attachment 20  
Revised 7/16/24

**ST. LOUIS COUNTY AMERICAN JOB CENTER  
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APPEALS**

The customer may appeal the approval/denial decision. The appeal must be submitted within **10 business days** of when the client was notified about the decision.

The appeal paperwork must be completed by the customer and signed by both the customer and American Job Center Staff member who will submit the appeal. The appeal paperwork along with the original ITA request must be submitted to the Workforce Development Division Director.

The Division Director will review the appeal and add any pertinent information necessary for the Appeals Committee to make a decision.

The Appeals Committee will review the appeal and render a final decision within 10 business days of original submission from the American Job Center Staff member.

**APPEALS FORM**

**Customer's Name:** \_\_\_\_\_

**State ID Number:** \_\_\_\_\_

**Type of Training:** \_\_\_\_\_

**Name of Training Institution:** \_\_\_\_\_

**Training Dates:** \_\_\_\_\_

**Please provide your reason for appealing:**

\_\_\_\_\_

\_\_\_\_\_

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Customer's Signature

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Date

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AJC Staff Signature

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Date

**Appeal Committee's Decision:**

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Revised 7/16/24

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**Date:** \_\_\_\_\_